

EXHIBIT 1

CJ22 3520 -
Ogden

* 1 0 5 2 8 4 5 4 8 6 * IN THE DISTRICT COURT IN AND FOR OKLAHOMA COUNTY
STATE OF OKLAHOMA

ANGELICA JOHNSON,)
Plaintiff,)
v.)
OMNI HOTELS MANAGEMENT)
CORPORATION,)
Defendant.)

Case No. CJ-2022-3520

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

JUL 25 2022

PETITIONRICK WARREN
COURT CLERK

109 _____

COMES NOW the Plaintiff, Angelica Johnson (hereinafter: "Plaintiff"), by and through her attorney of record, Susan Carns Curtiss, and for her cause of action against the Defendant, OMNI Hotels Management Corporation (hereinafter: "Defendant"), respectfully alleges and states as follows:

1. That on or about June 6, 2021, Plaintiff was a business invitee to Defendant's hotel located in Oklahoma City, Oklahoma County, Oklahoma.
2. That on or about June 6, 2021, Plaintiff was hit in the face with a piece of construction material that fell from above, while she was opening the sliding bathroom door in a guest room, causing Plaintiff to sustain personal injuries.
3. Plaintiff's face being hit by the piece of construction material was a direct result of the Defendants negligence in either: failing to adequately inspect and maintain the premises; creating a hidden trip, snare, or pitfall; and/or failing to warn of a hidden trap, snare or pitfall of which they had notice.

4. That at all relevant times, Defendant's employees, agents, and/or servants were acting within the scope or course of their employment for the Defendant and the Defendant is responsible for the negligent acts and/or omissions of their employees, agents, and/or servants.

5. That as a result of said negligence, Plaintiff has suffered personal injuries. Said injuries are permanent, painful, and progressive. As a further result of Defendant's negligence, Plaintiff has and will incur medical expenses, has and will suffer pain of mind and body, as well as other damages to which she is entitled in accordance with Oklahoma law, damaging Plaintiff in an amount in excess of \$75,000.00.

WHEREFORE, premises considered upon a trial had herein, Plaintiff, Angelica Johnson, prays for judgment over and against OMNI Hotels Management Corporation in an amount in excess of \$75,000.00, exclusive of interest, costs, punitive damages, attorney fees and all other relief as the Court deems just and equitable.

Respectfully submitted,

CARNS CURTISS LAW, PLLC



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JURY TRIAL DEMANDED
ATTORNEY'S LIEN CLAIMED